



THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF  
TELECOMMUNICATIONS & ENERGY**

ONE SOUTH STATION

**BOSTON, MA 02110**  
**(617) 305-3500**

**MITT ROMNEY**  
GOVERNOR

**KERRY HEALEY**  
LIEUTENANT GOVERNOR

**BETH LINDSTROM**  
DIRECTOR  
OFFICE OF CONSUMER AFFAIRS  
AND BUSINESS REGULATION

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May 5, 2005

SENT BY E-Mail, and  
First Class U.S. Mail

Patricia French, Esq.  
Bay State Gas Company  
300 Friberg Parkway  
Westborough, MA 01581-5039

Re: Bay State Gas Company, D.T.E. 05-12

Dear Ms. French:

Enclosed is the first set of information requests by the Department of Telecommunications and Energy to Bay State Gas Company regarding the above-captioned matter. Please submit copies of the Company's responses to the information requests to the Department by 5:00 p.m., May 19, 2004.

Should you have any questions please contact me at (617) 305-3762. Thank you for your prompt attention to this matter.

Sincerely,

Jody Stiefel  
Hearing Officer

Enc.  
cc: Service List  
Mary Cottrell, Secretary

FIRST SET OF INFORMATION REQUEST OF  
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO  
BAY STATE GAS COMPANY

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Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Bay State Gas Company ("Bay State" or "Company") the following information request(s) with respect to the March 1, 2005 Service Quality ("SQ") Report, ("Filing") D.T.E. 05-12.

**INSTRUCTIONS**

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department, one copy to the Service List, and three copies of the responses to Jody M. Stiefel, Hearing Officer.

**Requests**

- DTE 1-1 Please explain how each of the following SQ indices was recorded and measured. In your response, indicate if the Company faced any recording and measurement issues and how they were resolved. Provide documentation to support your answer.
- (a) Telephone Answering Factor
  - (b) Emergency Answering
  - (c) Service Appointments Kept
  - (d) Meter Reads
  - (e) Bill Adjustments
  - (f) Lost Time Accident Rate
  - (g) Response to Odor Calls
  - (h) Restricted Work Day Rate
  - (I) Unaccounted for Gas
  - (j) Restricted Work Day Rate
- DTE 1-2 Please detail the internal audits that have been conducted to assure the accuracy of Company data. If internal audits have not been performed, explain whether the Company plans to perform such audits.
- DTE 1-3 For each of the SQ penalty measures, please detail the initiatives the Company has implemented during 2004 to improve its performance.
- DTE 1-4 For each of the SQ penalty measures, please detail any conditions under which the Company operated during 2004 that may have influenced the results the Company achieved.
- DTE 1-5 Refer to the Company's Filing, Section Two at 4, regarding Staffing Levels. Please recalculate the mean and standard deviation taking into account the period 1993-2002.
- DTE 1-6 Please explain how the Company calculates the number of responses to Odor Calls. Specifically, if the Company receives more than one call regarding the same odor source, does the Company count this as one call or as multiple calls?
- DTE 1-7 Please refer to the Company's filing, Section Two, at 2.
- (a) Provide the "Summary-BSG Capital Spending History" Table using constant dollar.

- (b) Calculate the annual growth of “Capital Investment Completed” and “Replacements” and “Other Operations”.

DTE 1-8 Please refer to the Company’s filing, Section Two, at 3.

Recalculate the means and standard deviations shown in the table on “Unaccounted for Gas History” to exclude 2002-2003-2004 figures (i.e., recalculate the means and standard deviations for the period 1992-2001).

DTE 1-9 Please refer to the Company's, Section Two, at 4.

- (a) Please explain the differences between the staffing levels reported in DTE 03-10 and DTE 04-12 from the staffing levels presented in the current filing for the period starting 1993. Please refer to Table A below.
- (b) Please draw a graph showing the BSG total full-time employees and BSG total part-time employees over time. Please discuss the negative trend and specify the causes of the overall reduction of the staffing level since 1993.
- (c) Break down the staffing levels presented in the table on "Staffing History" by job category/job classification for the period 1993-2004 for both full-time and part-time employees.

Table A: Full-time and Part-time Staffing levels reported in DTE 03-10, DTE 04-12, and DTE 05-12

Year	DTE 03-10	DTE 04-12	DTE 05-12
1993	1028 (0)	1028 (0)	889 (0)
1994	1023 (49)	1023 (49)	887 (41)
1995	1036 (26)	1036 (26)	900 (26)
1996	1031 (0)	1031 (0)	875 (0)
1997	920 (57)	920 (57)	789 (44)
1998	950 (52)	950 (52)	815 (46)
1999	911 (26)	911 (26)	782 (25)
2000	853 (23)	853 (23)	735 (22)
2001	781 (20)	781 (20)	671 (19)
2002	622 (13)	622 (13)	532 (12)
2003		592 (24)	504 (23)
2003			545 (23)

DTE 1-10 Please provide electronic versions of all responses, including calculations and worksheets together with your responses.